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11 *Attorneys for Plaintiff, Wells Fargo Bank N.A. as Trustee on behalf of the Certificate holders
12 Park Place Securities, Inc. Asset-Backed Pass-Through Certificates Series, 2005-WCW1*

13 **UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA**

15 WELL'S FARGO BANK, N.A. AS TRUSTEE
16 ON BEHALF OF THE CERTIFICATE-
17 HOLDERS PARK PLACE SECURITIES,
18 INC. ASSET-BACKED PASS-THROUGH
19 CERTIFICATES SERIES 2005-WCW1,

20 Plaintiff,

21 vs.

22 FIDELITY NATIONAL TITLE GROUP,
23 INC.; FIDELITY NATIONAL TITLE
24 INSURANCE COMPANY; DOE
25 INDIVIDUALS I through X; and ROE
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:22-cv-00616-APG-EJY

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO FIDELITY NATIONAL TITLE
GROUP, INC.'S MOTION TO DISMISS
[ECF No. 23]**

(Second Request)

26 COMES NOW Plaintiff, Wells Fargo Bank N.A. as Trustee on behalf of the Certificate
27 holders Park Place Securities, Inc. Asset-Backed Pass-Through Certificates Series, 2005-WCW1
28 ("Wells Fargo") and Defendants Fidelity National Title Group, Inc. ("FNTG") and Fidelity
National Title Insurance Company ("FNTIC" collectively the "Defendants"), by and through their
counsel of record, hereby stipulate and agree as follows:

1. On April 12, 2022, Wells Fargo filed its Complaint in Eighth Judicial District Court, Case
2. On April 13, 2022, Defendants filed a Petition for Removal to this Court [ECF No. 1];

- 1 3. On September 7, 2022, FNTG filed a Motion to Dismiss [ECF No. 23];
2 4. Wells Fargo's deadline to respond to FNTG's Motion to Dismiss is currently November
3 21, 2022 [ECF No. 25];
4 5. The parties have reached an agreement in principle by which FNTG will be dismissed
5 from this matter. In order to conserve resources, the parties stipulate and agree that Wells
6 Fargo shall have an additional 60 days to respond to FNTG's Motion to Dismiss through
7 and including Friday, January 20, 2023. Should the parties finalize their agreement before
8 then, an appropriate dismissal of FNTG will be filed;
9 6. Counsel for FNTG does not oppose the requested extension;
10 7. This is the second request for an extension which is made in good faith and not for
11 purposes of delay.

12 **IT IS SO STIPULATED.**

13 DATED this 21st day of November, 2022.

14 WRIGHT, FINLAY & ZAK, LLP

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16 /s/ *Lindsay D. Dragon*
17 Lindsay D. Dragon, Esq.
18 Nevada Bar No. 13474
19 7785 W. Sahara Ave., Suite 200
20 Las Vegas, NV 89117
21 *Attorneys for Plaintiff, Wells Fargo Bank N.A.
as Trustee on behalf of the Certificate holders
Park Place Securities, Inc. Asset-Backed
Pass-Through Certificates Series, 2005-
WCWI*

13 DATED this 21st day of November, 2022.

14 SINCLAIR BRAUN LLP

15 _____
16 /s/ *Kevin S. Sinclair*
17 Kevin S. Sinclair, Esq.
18 Nevada Bar No. 12277
19 16501 Ventura Blvd., Suite 400
20 Encino, CA 91436
21 *Attorney for Defendants, Fidelity National
Title Group, Inc. and Fidelity National Title
Insurance Company*

22 **IT IS SO ORDERED.**

23 Dated this 22nd day of November, 2022.

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25 _____
26 UNITED STATES DISTRICT JUDGE

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